

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

CUSTOMS AND TAX ADMINISTRATION OF
THE KINGDOM OF DENMARK (SKAT) TAX
REFUND LITIGATION

18-MD-2865 (LAK)

This document relates to: 18-cv-10119 (LAK)
18-cv-10122 (LAK)
18-cv-10123 (LAK)
18-cv-10124 (LAK)
18-cv-10125 (LAK)
18-cv-10126 (LAK)
18-cv-10133 (LAK)
18-cv-10134 (LAK)
18-cv-10135 (LAK)
18-cv-10136 (LAK)

ECF Case

DECLARATION OF MARK D. ALLISON

I, MARK D. ALLISON, declare as follows:

1. I am a Member of the law firm of Caplin & Drysdale, Chartered and am counsel
for the following Defendants:

- a. The Bella Consultants Pension Plan and Roger Lehman;
- b. The Sinclair Pension Plan and Roger Lehman;
- c. The Mueller Investments Pension Plan and Roger Lehman;
- d. The Green Group Site Pension Plan and Roger Lehman;
- e. Blackrain Pegasus LLC Solo 401K Plan and Doston Bradley;
- f. Pegasus Fox 23 LLC Solo 401K Plan and Doston Bradley;
- g. Delgado Fox LLC Solo 401K Plan and Doston Bradley;
- h. Gyos 23 LLC Solo 401K Plan and Doston Bradley;

- i. The Joanne E. Bradley Solo 401K Plan and Doston Bradley; and
 - j. The Oak Tree One 401K Plan and Doston Bradley.
2. I have personal knowledge of the matters stated in this declaration.
 3. Attached hereto as Exhibit 1 is a true and correct copy of the Complaint filed by SKAT against The Bella Consultants Pension Plan and Roger Lehman, on May 4, 2018 (SDNY Dkt. No. 1:18-cv-10136-LAK; S.D. Ohio Dkt. No. 1:18-cv-00309-MRB).
 4. Attached hereto as Exhibit 2 is a true and correct copy of the Complaint filed by SKAT against The Sinclair Pension Plan and Roger Lehman, on May 22, 2018 (SDNY Dkt. No. 1:18-cv-10133-LAK; S.D. Ohio Dkt. No. 1:18-cv-00351-SJD).
 5. Attached hereto as Exhibit 3 is a true and correct copy of the Complaint filed by SKAT against The Green Group Site Pension Plan and Roger Lehman, on May 4, 2018 (SDNY Dkt. No. 1:18-cv-10134-LAK; S.D. Ohio Dkt. No. 1:18-cv-00311-MRB).
 6. Attached hereto as Exhibit 4 is a true and correct copy of the Complaint filed by SKAT against The Mueller Investments Pension Plan and Roger Lehman, on May 4, 2018 (SDNY Dkt. No. 1:18-cv-10135-LAK; S.D. Ohio Dkt. No. 1:18-cv-00310-TSB).
 7. Attached hereto as Exhibit 5 is a true and correct copy of the Complaint filed by SKAT against Blackrain Pegasus LLC Solo 401K Plan and Doston Bradley, on June 8, 2018 (SDNY Dkt. No. 1:18-cv-10119-LAK; S.D. Tex. Dkt. No. 4:18-cv-01889).
 8. Attached hereto as Exhibit 6 is a true and correct copy of the Complaint filed by SKAT against Gyos 23 LLC Solo 401K Plan and Doston Bradley, on June 8, 2018 (SDNY Dkt. No. 1:18-cv-10122-LAK; S.D. Tex. Dkt. No. 4:18-cv-01895).

9. Attached hereto as Exhibit 7 is a true and correct copy of the Complaint filed by SKAT against The Oak Tree One 401K Plan and Doston Bradley, on June 8, 2018 (SDNY Dkt. No. 1:18-cv-10123-LAK; S.D. Tex. Dkt. No. 4:18-cv-01897).

10. Attached hereto as Exhibit 8 is a true and correct copy of the Complaint filed by SKAT against The Joanne E. Bradley Solo 401K Plan and Doston Bradley, on June 8, 2018 (SDNY Dkt. No. 1:18-cv-10124-LAK; S.D. Tex. Dkt. No. 4:18-cv-01898).

11. Attached hereto as Exhibit 9 is a true and correct copy of the Complaint filed by SKAT against Delgado Fox LLC Solo 401K Plan and Doston Bradley, on June 8, 2018 (SDNY Dkt. No. 1:18-cv-10125-LAK; S.D. Tex. Dkt. No. 4:18-cv-01899).

12. Attached hereto as Exhibit 10 is a true and correct copy of the Complaint filed by SKAT against Pegasus Fox 23 LLC Solo 401K Plan and Doston Bradley, on June 8, 2018 (SDNY Dkt. No. 1:18-cv-10126-LAK; S.D. Tex. Dkt. No. 4:18-cv-01900).

I, MARK D. ALLISON, hereby declare under penalty of perjury that the forgoing is true and correct.

Dated: New York, New York

January 31, 2019

s/ Mark D. Allison
Mark D. Allison
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Pegasus Fox 23 LLC Solo 401K Plan
Delgado Fox LLC Solo 401K Plan
Gyos 23 LLC Solo 401K Plan
The Joanne E. Bradley Solo 401K Plan
The Oak Tree One 401K Plan
Doston Bradley

CERTIFICATE OF SERVICE

I hereby certify that on January 31, 2019, true and correct copies of the Declaration of Mark D. Allison and its Exhibits were served by CM/ECF or as indicated below on the following:

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s/ Mark D. Allison _____

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